UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

WILLIAM S. CLAY, Administrator ad Litem of the Estate of JIMMIE MARIE CLAY, deceased,)))
Plaintiff,)
v.) No. 3:13-cv-00877
GGNSC SPRINGFIELD LLC, individually and d/b/a GOLDEN LIVINGCENTER) Judge Trauger
SPRINGFIELD; GOLDEN GATE NATIONAL SENIOR CARE LLC,) Magistrate Judge Brown
individually and d/b/a GOLDEN LIVING; GGNSC ADMINISTRATIVE SERVICES LLC, individually and d/b/a GOLDEN)))
VENTURES; GOLDEN GATE ANCILLARY LLC, individually and d/b/a GOLDEN))
INNOVATIONS; GGNSC CLINICAL SERVICES, LLC, individually and d/b/a))
GOLDEN CLINICAL SERVICES; GGNSC HOLDINGS LLC, individually and d/b/a GOLDEN HORIZONS; and GGNSC EQUITY)))
HOLDINGS LLC,))
Defendants.)

STIPULATION AND AGREED ORDER OF DISMISSAL

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, the Plaintiff, William S. Clay, Administrator ad Litem of the Estate of Jimmie Marie Clay, deceased, and Defendants, GGNSC Springfield, LLC, individually and d/b/a Golden LivingCenter-Springfield; Golden Gate National Senior Care, LLC, individually and d/b/a Golden Living; GGNSC Administrative Services, LLC, individually and d/b/a Golden Ventures; Golden Gate Ancillary, LLC, individually and d/b/a Golden Innovations; GGNSC Clinical Services, LLC, individually and

d/b/a Golden Clinical Services; GGNSC Holdings LLC, individually and d/b/a Golden Horizons;

and GGNSC Equity Holdings, LLC ("Defendants"), by and through counsel, announce to the

Court that all matters here in controversy between them have been compromised and settled out

of Court, and that Plaintiff, for valuable consideration, has executed a Release in full and final

settlement of all of his claims against Defendants, including any and all subrogation interests or

liens, if any, arising out of the matters here in controversy. It is therefore:

ORDERED that Plaintiff's cause of action should be dismissed as to all Defendants with

full prejudice to Plaintiff against the re-filing of the same and that Defendants be relieved from

any and all further responsibility in this matter. It is further ORDERED that Plaintiff shall

satisfy any and all present or future liens of any kind, known or unknown, which may relate to

the settlement proceeds. Each party will bear its own costs and attorney's fees.

IT IS SO ORDERED.

ALETA A. TRAUÇÎ

U.S. District Judge

APPROVED FOR ENTRY:

NORRIS & NORRIS PLC

s/John L. Norris by AEK w/permission
John L. Norris (TN BPR #6007)
424 Church Street
Suite 1300
Nashville, TN 37201-3310
(615) 627-3959 - Telephone
(615) 627-3962 - Facsimile
john@norrislaw.net

ROCKY MCELHANEY LAW FIRM

s/Rocky McElhaney by AEK w/permission Rocky McElhaney (TN BPR #20205) Music Row, 1516 16th Avenue South Nashville, TN 37212 (615) 425-2500 - Telephone (615) 425-2501 - Facsimile rocky@rockylawfirm.com russell@rockylawfirm.com

Attorneys for Plaintiff

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C.

s/Amanda E. Kelley
Thomas O. Helton (TN BPR 001919)
Amanda E. Kelley (TN BPR 022872)
1800 Republic Centre
633 Chestnut Street
Chattanooga, TN 37450-1800
(423) 209-4194 - Telephone
(423) 752-9544 - Facsimile
thelton@bakerdonelson.com

Attorney for Defendants